

STATE OF SOUTH CAROLINA

(Caption of Case)

Application of Progress Energy Carolinas,
Incorporated for Approval of its Demand-Side
Management and Energy Efficiency Rider

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET

NUMBER: 2012 - 93 - E

(Please type or print)

Submitted by: J. Blanding Holman

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NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition ☐ Request for item to be placed on Commission's Agenda expeditiously

☐ Other:

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)			
<input checked="" type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request	
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification	
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation	
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement	
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment	
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter	
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response	
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery	
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input checked="" type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition	
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation	
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena	
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff	
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other:	
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest		
<input type="checkbox"/> Other:	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit		
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report		

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2012-93-E

In the Matter of:)	
)	
)	
Application of Progress Energy)	
Carolinas, Incorporated for)	PETITION TO INTERVENE
Approval of its Demand-Side)	
Management and Energy Efficiency)	
Rider)	

Southern Alliance for Clean Energy (“SACE”) and the South Carolina Coastal Conservation League (“CCL”) (collectively, “Petitioners”) hereby petition the South Carolina Public Service Commission (“Commission”) to intervene in the above-captioned docket pursuant to R.103-825 of the Commission’s rules. In support of this petition, Petitioners state as follows:

1. On March 1, 2012, Progress Energy Carolinas, Incorporated (“PEC”) filed an application for approval of its Demand-Side Management and Energy Efficiency Rider DSM/EE-1, to become effective July 1, 2012, pursuant to the Stipulation on Procedure and Mechanism for Recovery of Costs and Incentives for Demand-Side Management and Energy Efficiency Programs (“Stipulation”) approved in Docket No. 2008-251-E and the schedule set forth in the Commission’s Order Revising Filing Dates in Docket No. 2011-181-E.¹

¹ Commission Order No. 2011-716.

2. PEC seeks recovery through its proposed DSM/EE rider of actual and estimated DSM/EE costs incurred from April 1, 2011 through March 31, 2012,² and for forecasted costs from July 1, 2012 through June 30, 2013. PEC Exhibit No. 1 at 1.

3. SACE is a nonprofit organization whose mission is to promote responsible energy choices that create global warming solutions and ensure clean, safe and healthy communities throughout the Southeast. The principal address of SACE is P.O. Box 1842, Knoxville, Tennessee 37901. SACE also has offices in Florida, Georgia, North Carolina and South Carolina.

4. SACE has members in South Carolina who receive electricity service from PEC and who are subject to the direct impacts of PEC's DSM/EE rider. SACE and its members are interested in promoting greater reliance on energy conservation and efficiency to meet South Carolina's energy needs.

5. CCL is a nonprofit corporation organized under the laws of the State of South Carolina. The principal address of CCL is P.O. Box 1765, Charleston, SC 29402. As an advocate for conservation and energy efficiency, CCL supports the development of energy policy that is in the public interest of South Carolinians.

6. CCL has members in South Carolina who receive electricity service from PEC and who are subject to the direct impacts of PEC's DSM/EE rider. CCL and its members are interested in promoting greater reliance on energy efficiency as an energy resource in South Carolina.

7. Petitioners participated actively as parties in Docket No. 2008-251-E, in which the Commission approved the Stipulation pursuant to which PEC has filed its

² Actual values were used for April 1, 2011 through January 31, 2012, and estimated values were used for February and March of 2012. See Dir. Testimony of Robert P. Evans at 7, Docket No. 2012-93-E (March 1, 2012).

application in this docket, and in Docket No. 2011-181-E, in which the Commission approved PEC's requested DSM/EE rider, set forth additional information requirements, and set a schedule for future annual cost recovery proceedings.³ Petitioners have an interest in this proceeding.

8. Petitioners seek to intervene in this proceeding to ensure that their members' interests in promoting energy savings through energy efficiency are represented.

9. Petitioners do not seek a hearing in this proceeding. Petitioners have not yet fully developed their position in this proceeding but plan to present it in the form of written comments to be filed with the Commission by May 15, 2012, pursuant to the Commission's Order Revising Filing Dates issued in Docket No. 2011-181-E.

10. Petitioners are represented by the following counsel in this proceeding:

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WHEREFORE, Petitioners pray that they be allowed to intervene in this matter.

Respectfully submitted this 30th day of March, 2012.

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Attorney for Petitioners

³ See Commission Order Nos. 2011-474, 2011-619 and 2011-716.

CERTIFICATE OF SERVICE

I hereby certify that the parties listed below have been served via first class U.S. Mail with a copy of the Petition to Intervene of the South Carolina Coastal Conservation League and Southern Alliance for Clean Energy.

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This 30th day of March, 2012.

s/ J. Blanding Holman, IV
J. Blanding Holman, IV